## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

## NOTICE OF MOTION TO DISMISS THE CONSOLIDATED AMENDED CLASS ACTION COMPLAINT ON BEHALF OF DEFENDANT DIDI GLOBAL INC.

PLEASE TAKE NOTICE that, upon the Consolidated Amended Class Action Complaint, filed January 7, 2022 (ECF No. 88); the Memorandum of Law, dated March 8, 2022, filed herewith; the Declaration of Corey Worcester, dated March 8, 2022, and exhibits thereto, filed herewith; and upon all prior papers and proceedings herein, Defendant DiDi Global Inc. will move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for an Order dismissing the Amended Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court-ordered briefing schedule (ECF No. 73), entered October 22, 2021, Plaintiffs' memorandum of law in opposition, if any, must be served on the undersigned counsel by May 9, 2022.

Dated: March 8, 2022

New York, New York

## Respectfully submitted,

## /s/ Corey Worcester

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